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March 14, 2025

Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Frank Quiroga, 18 Cr. 674 (PGG)

Dear Judge Gardephe:

I am defense counsel for Frank Quiroga, who was notified today that he has been designated to FCI Hazelton in West Virginia. At the sentencing hearing, your Honor set a surrender date of March 17, 2025, for this 18-month term of imprisonment.

Immediately after learning of the designation, Mr. Quiroga and I started exploring options for travel to FCI Hazelton. Mr. Quiroga is indigent and has nobody to drive him there. When I asked the facility for public transportation options, they suggested that Mr. Quiroga "check on buses to Cumberland Maryland or Pittsburgh, but the Taxi fare from either will be for over an hour of Transportation."

I respectfully request that the surrender date be delayed for 21 days to give Mr. Quiroga an opportunity to find a way to get to FCI Hazelton. The only other option would be to surrender at the U.S. Marshal or at a local facility. I notified AUSA Andrew Chan about this application, but he has not yet had an opportunity to respond.

Thank you for your courtesy and attention to this matter.

Sincerely,

/s/

Donald J. Yannella, Esq.

MEMO ENDORSED

The application is denied.
If Defendant Quiroga cannot
arrange transportation to FCI Hazelton,
he will surrender to the
U.S. Marshal for this District
by 2:00 p.m. on March 17, 2025.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: March 14, 2025